

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

Air Traffic Organization Policy



Effective Date: 02/18/2011 Cancellation Date: 02/18/2012

SUBJ: National Airspace System Change Proposal (NCP) Process Support of the Safety Management System (SMS)

- Purpose of This Notice. This notice addresses changes to the Federal Aviation Administration 1. NCP process to support the SMS. Key elements include changes in responsibility for each of the following: Air Traffic Organization (ATO) Office of Safety (AJS) with regard to the Must Evaluation process; Configuration Control Board (CCB) Safety Must Evaluators for assessing the appropriateness of any safety documentation attached to an NCP; and CCB Safety Must Evaluators, CCB Chairpersons and Secretariats for assuring safety documentation is attached to each NCP package before adjudication. Casefile/NCP originators are ultimately responsible for ensuring signed SMS compliant safety documentation is attached to the Casefile/NCP package; however, they may utilize assistance from any Casefile/NCP stakeholder. Additionally, the Casefile/NAS Change Proposal Safety Risk Management (CNSRM) checklist is no longer an acceptable form of safety documentation in accordance with the below Cancellation paragraph. Finally, the Casefile/NCP process is NOT intended to be a Quality Assurance process for the SMS. Any safety concerns relating to safety documentation should be expressed through the appropriate safety professionals. The NCP process is described in detail in the latest version of FAA Order 1800.66, Configuration Management Policy.
- **2. Audience**. All ATO employees and managers who are responsible for National Airspace System (NAS) systems, equipment, and facilities.
- 3. Where Can I Find This Notice. You can find this notice on the MyFAA employee website. Select "tools & resources," then select "order and notices."
- **4. What This Notice Cancels.** Notice N JO 1800.2, NAS Change Proposal Process Support of the Safety Management System, is cancelled. Notice N JO 1800.145 also eliminates the CNSRM checklist from the list of acceptable forms of safety documentation; however this requirement will be implemented 90 days from the effective date of this Notice to facilitate an orderly transition for NCPs on the verge of CCB adjudication. After this transition date, the CNSRM checklist will no longer be an acceptable form of safety documentation to support CCB adjudication. The reference to Notice N JO 1800.2 will be removed from Order 1800.66, Configuration Management Policy, via Change 3 to the order.
- **5. Background.** Aviation safety is a fundamental mission of the FAA. Thus, changes to NAS systems, equipment, and facilities must not introduce unacceptable risk into the NAS. These NAS system changes are authorized and documented through the NCP and Safety Risk Management (SRM) process. The NCP process does not preclude evaluation of NAS changes for NAS system safety; however, the agency formerly did not have a corporate infrastructure in place to systematically assess NCPs for safety risks. The FAA's 2004-2008 Flight Plan identified a specific initiative to

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implement the SMS using a phased approach with initial implementation focusing on targeted NAS changes. In November 2003, the ATO was created and with it AJS was established to provide an infrastructure to address policy, training, oversight/monitoring, and other resources to effectively integrate system safety into the operational NAS. This notice provides interim policy changes to the NCP process to support the SMS as described in the current ATO SMS Manual and enables required safety documentation and NCP reviews to occur separately or concurrently, provided the resulting signed SMS compliant safety documentation is included in the NCP package prior to Configuration Control Decision (CCD) adjudication (approval or disapproval). This notice also establishes AJS as a standard must evaluator on all NCPs, and highlights the responsibilities of CCB Safety Must Evaluators, CCB Executive Secretariats, and CCB Chairpersons.

- 6. Action. FAA Form 1800-2, NAS Change Proposal, in conjunction with signed SMS compliant safety documentation, as defined in the current ATO SMS Manual, must be used to support effective decisions regarding changes to operational NAS systems, equipment, and facilities. NCP numbers shall be assigned only to those casefiles that reference (in Block 22f of the casefile) the ATO's Safety Risk Management Tracking System (SRMTS) number of the safety case associated with the proposed change. The ATO's SRMTS is an automated system that is used to track the status of SRM assessments (refer to paragraph 12). All SRM assessments are required to be entered into the ATO's SRMTS. All CCB Safety Must Evaluators, CCB Chairpersons, and Secretariats must ensure that each NCP includes signed SMS compliant safety documentation prior to CCD adjudication (approval or disapproval).
- 7. SRMD Applicability. When proposing a change to the NAS, change proponents must perform a preliminary safety analysis. If the change is not expected to introduce safety risk into the NAS, there is no need to conduct further safety analysis; instead, the change proponent documents that determination, along with the justification for the decision as to why the change is not subject to the provisions of additional SRM assessments and supporting documentation beyond the initial safety analysis in an SRM Decision Memo (SRMDM), described in Section 3.5.2 of the SMS Manual. If the change is expected to impact the safety of the NAS, it is necessary to conduct further safety analysis and document the safety analysis in an SRMD. Even when a change is proposed to improve safety, the need to conduct further safety analysis remains. For specific guidelines and criteria for making the determination, refer to the ATO SMS Manual available on the intranet at: https://employees.faa.gov/org/linebusiness/ato/safety/

NOTE: The organization/change proponent must allow sufficient time for the production and review of the appropriate safety document prior to CCD adjudication. Timeframes for preparation of safety documentation may vary from several days, weeks, or months depending on the complexity of the change and potential hazards involved. Therefore, it is highly recommended that coordination with the Service Unit Safety Office begin prior to Casefile/NCP origination. The importance of having the safety documentation available in sufficient time for review cannot be overemphasized and it is recommended that a minimum of thirty (30) days be allowed for the safety review (30 days prior to Casefile/NCP review).

8. Casefile/NCP SRM Documentation and Guidelines. All Casefile/NCPs will require signed SMS compliant safety documentation, as defined in the current ATO SMS Manual, prior to CCD adjudication. If it is determined that there is the potential for an impact to NAS safety, then the

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findings of safety risk assessments shall be documented in an SRMD. The SRMD is a report that documents the safety risk assessment findings to support a decision that the proposed system change meets risk acceptance criteria. If it is determined that there is no impact to NAS safety, then an SRMDM must be prepared to document and justify these findings.

- a. All signed SMS compliant safety documentation attached to casefiles must reference the applicable NCP number(s) or casefile number(s) traceable to the NCP number(s).
- b. Safety Managers, Safety Engineers, or designated safety personnel within their respective organizations shall ensure the sufficiency and comprehensiveness of safety documentation signed by the appropriate authority implementing the NAS change, as outlined in the ATO SMS Manual.

9. Responsibilities.

- a. The Office of Safety (AJS) is responsible for:
 - (1) Reviewing all NCPs (including initially identified high risk).
- (2) Providing recommendations to NCP originators and assisting NCP originators in resolving safety related comments, if requested.
- (3) Ensuring appropriate action items are recommended for incorporation into the CCD documentation as necessary.
- (4) Developing and implementing an assessment process to verify adherence to the requirements of this Notice with regard to SRM in the NCP process.
 - (5) Participating as a permanent member of the NAS CCB.
 - b. Safety Must Evaluators are responsible for:
 - (1) Reviewing NCPs during the Must Evaluation process.
- (2) Ensuring that each NCP includes signed SMS documentation compliant with SMS policy prior to CCD approval by non-concurring or concurring with comment on the NCP until the signed SMS compliant safety documentation is attached to the Casefile/NCP package.
- (3) Providing recommendations to NCP originators and assisting NCP originators in resolving safety related comments, if needed.
- (4) Ensuring appropriate action items are recommended for incorporation into the CCD documentation as necessary.
 - (5) Participating as a permanent member of CCBs applicable to their respective Service Unit.

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c. Casefile/NCP originators are responsible for ensuring signed SMS compliant safety documentation is attached to the Casefile/NCP package; however, this may be accomplished by utilizing assistance from any Casefile/NCP stakeholder.

NOTE: NCP numbers shall be assigned only to those casefiles that reference (in Block 22f of the casefile) the ATO's SRMTS number of the safety case associated with the proposed change. All Casefile/NCPs will require signed SMS compliant safety documentation, as defined in the current ATO SMS Manual prior to CCD adjudication.

- d. Configuration Management (CM) Configuration Control Board (CCB) Secretariats are responsible for ensuring that only those NCPs that include signed SMS compliant safety documentation are recommended to the CCB Chairpersons for adjudication.
- e. CCB Chairpersons are responsible for adjudicating only NCPs that include signed SMS compliant safety documentation.
- f. CM Control Desk personnel are responsible for assigning NCP numbers to only those casefiles that reference (in Block 22f of the casefile) the ATO's SRMTS number of the safety case associated with the proposed change.
- g. All NAS CCBs (NAS CCB and subordinate CCBs) are responsible for ensuring AJS and other appropriate safety representative(s) are included in Must Evaluation reviews (Safety Must Evaluators).
- **10. Feedback.** Organizations should provide feedback regarding the effectiveness and usefulness of this directive to the OPI for this Notice (Enterprise Configuration Management, AJW-281).
- 11. **Issuance of Order.** Following review and evaluation of the suggestions and recommendations received, FAA Order 1800.66 will be updated and fully coordinated in accordance with FAA Order 1320.1, FAA Directives System.
- **12. Website Links.** The following website links are available to assist in complying with this notice: ATO's SRMTS, http://srm.faa.gov/srmtracker/ and FAA CM/Safety website, http://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/techops/atc_facilities/cm/safety/.
- **13. Distribution.** This notice is distributed in Washington headquarters to group level within the ATO; to all ATO Service Areas and Service Centers; and to all Technical Operations, En Route and Oceanic, and Terminal field offices with a standard distribution.

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Vice President, Technical Operations Services

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